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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**[PROPOSED] ORDER APPROVING
PARTICIPATING COUNSEL
PERFORMING COMMON BENEFIT
WORK RELATED TO PLAINTIFFS'
RESPONSES TO DISCOVERY**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor

Before the Court is Co-Lead Counsel's request to engage other certain named Plaintiffs' retained counsel ("Participating Counsel") to perform Common Benefit Work related to responding to Defendants' written discovery to named Plaintiffs and anticipated depositions of named Plaintiffs, in accordance with Pretrial Order No. 8: Duties and Authority of Co-Lead Counsel, Dkt. 120, ¶ 17 and Pretrial Order No. 9: Protocol for Common Benefit Work and Expenses, Dkt. 121.

Participating Counsel specifically consists of the following firms: Cohen Milstein Sellers & Toll PLLC; Gustafson Gluek PLLC; Hagens Berman Sobol Shapiro LLP; Motley Rice LLC;

Schonbrun Seplow Harris Hoffman & Zeldes, LLP; Sulaiman Law (Atlas Consumer Law); and Cuneo Gilbert & LaDuca, LLP.

The Court APPROVES the request, subject to the following requirements. Co-Lead Counsel may authorize Participating Counsel to assist in: (a) responding to Defendants' discovery requests for their clients; and (b) representing their clients in depositions, together with Co-Lead Counsel, consistent with Pretrial Order No. 8, Dkt. 120, ¶ 5. Such Participating Counsel may not perform Common Benefit Work other than that specifically requested by Co-Lead Counsel that is related to either (a) or (b) as set forth above. All work shall conform to the requirements for Common Benefit Work set forth in Pretrial Order No. 9, Dkt. 121. Participating Counsel's receipt of reasonable common benefit attorneys' fees and reimbursement of costs and expenses shall be subject to Section I of Pretrial Order No. 9, Dkt 121. As required by Pretrial Order No. 8, Dkt. 120, Co-Lead Counsel will: (a) manage and oversee the work of Participating Counsel; (b) collect cost and time records from Participating Counsel; and (c) ensure that Participating Counsel's work adheres to the Court-approved protocol regarding attorneys' fees, expenses, and costs. Co-Lead Counsel is solely authorized to conduct all case-related correspondence, email, and phone communications on behalf of the Class.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT COURT JUDGE